

APR 6 2015

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA

Roanoke Division

THOMAS W. LOVEGROVE,)	Civil No.
)	
Plaintiff,)	7:14-CV-00329-MFU
)	
v.)	
)	
OCWEN HOME LOANS SERVICING,)	
L.L.C.,)	
)	
Defendant.)	

PLAINTIFF'S SUPPLEMENTAL RESPONSES TO DEFENDANT'S FIRST SET OF
INTERROGATORIES

1. State the name, address, and telephone number of each person with personal knowledge of any fact that supports, refutes, or otherwise relates to any of the allegations or claims made in the First Amended Complaint against Ocwen.

RESPONSE: See attached document, Bates Stamp No. 1, 2, and 149. Also see Exhibit A to Plaintiff's Initial Disclosures Pursuant to Federal Rule of Civil Procedure 26(a)(1). In addition, Derek Cha, SweetFrog, 730 C Research Road, Richmond VA 23236, Tel: 804-835-6779.

2. Identify all documents and communications that you contend establish, support, refute, or otherwise relate to any of the allegations or claims in the First Amended Complaint or Ocwen's affirmative defenses to the First Amended Complaint.

RESPONSE: In plaintiff's responses to Defendant's First Set of Requests for Production of Documents, Bates Stamp No. 9-148, 192-205, OLS 000001-000063, OLS 141-158; In plaintiff's responses to Defendant's Second Set of Requests for Production of

Documents, Bates Stamp No. 1-349.

17. Identify and describe with specificity all damages you are claiming against the Defendant in this action, including the types of damages and specific amounts claimed for damages.

RESPONSE: I claim statutory damages for violation of the Fair Debt Collection Practices Act of \$1000.00 plus attorney fees and costs. I claim actual damages for violation of the Fair Credit Reporting Act as a result of losing construction projects for SweetFrog that I would have been hired to perform, but that I was not hired to perform because of Ocwen's inaccurate credit reporting. The list of those projects is at Bates Stamp No. 1-2 and the 193 Sweet Frog stores listed at Bates Stamp No. 151-189. My calculation of the net profit from the Sweet Frog stores is based upon the documents at Bates Stamp No. 192-201. I claim damages for emotional distress in the amount \$100,000.00 as a result of being unable to pursue my life's work, the indignity of being unable to obtain credit, and of being unable to obtain a fresh start even though I filed bankruptcy.

Thomas W. Lovegrove

STATE OF _____

COUNTY/CITY OF _____

Thomas W. Lovegrove appeared before me this ____ day of November 2014 and acknowledged the truth of the foregoing answers under oath.

Notary Public

My Commission Expires: _____